



UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

MCKENZIE MARIE EARLEY,

Defendant

Case No. 2:25-mj-02343-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

As described in the accompanying attachment, defendant violated the following statutes:

Code Sections

18 U.S.C. § 1956; 21 U.S.C. §§ 846 and
841(a)(1), (b)(1)(C)

Offense Description

Conspiracy to launder money and to
distribute fentanyl and
methamphetamine

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/ Lyndon Versoza

Complainant's signature

Postal Inspector Lyndon Versoza

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 04/18/2025

Joel Richlin
Judge's signature

City and state: Los Angeles, California

A. Joel Richlin, U.S. Magistrate Judge

Printed name and title

Complaint Attachment

Count One, 18 U.S.C. § 1956

Beginning in or before 2022, and continuing through November, 2022, in Los Angeles County, within the Central District of California, and elsewhere, defendant MCKENZIE MARIE EARLEY and others conspired to launder money, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), by knowingly conducting and attempting to conduct financial transactions involving the proceeds of specified unlawful activity, that is, wire fraud, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

Count Two, 21 U.S.C. § 846

Beginning in or before 2023, and continuing through May 13, 2024, in Los Angeles County, within the Central District of California, and elsewhere, defendant MCKENZIE MARIE EARLEY conspired with others to knowingly and intentionally distribute a mixture and substance containing a detectable amount methamphetamine, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] (“fentanyl”), a Schedule II narcotic drug controlled substance, both in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

AFFIDAVIT

I, Lyndon A. Versoza, being duly sworn, hereby depose and state as follows:

I. TRAINING AND EXPERIENCE

1. I am a United States Postal Inspector employed by the United States Postal Inspection Service ("USPIS"), where I have served since June 2005. I have been a federal law enforcement officer since 2002. Currently, I am assigned as a Money Laundering Specialist for the Contraband Interdiction and Investigations (CI2) North Team for the USPIS Los Angeles Division. In this capacity I am responsible for investigating criminal violations of money laundering and structuring laws, such as when the services of the United States Postal Service are employed by criminals as part of the means to launder or conceal illicit funds, and/or avoid banking reporting requirements. I am also one of seven Postal Inspectors in the U.S. currently designated by USPIS as a Subject Matter Expert ("SME") in money laundering investigations. As a SME, I have spoken at money laundering conferences and provided training to the financial and banking industry and other law enforcement agents. I have also received both formal and informal money laundering training from USPIS and other government and private

agencies. During my 20-year career as a Postal Inspector, I have investigated: thieves, burglars, rapists, murderers, armed robbers, prison and street gangs, drug and gun trafficking organizations, and perpetrators of financial violations (including money launderers, darknet vendors, digital currency launderers, identity thieves and fraudsters). For approximately five years, prior to investigating money laundering crimes, I was assigned to investigate child exploitation and sex trafficking. In that assignment, I worked both independently and in a task force where I led and participated in investigations related to crimes involving the exploitation of children and sex trafficking domestically and internationally. In that capacity, I also earned a designation by USPIS as a SME in Child Exploitation Investigations.

2. From 2002 to 2005, prior to my service as a U.S. Postal Inspector, I served as a law enforcement officer with the US Immigration and Naturalization Service, which later became part of the U.S. Department of Homeland Security. In this capacity I enforced immigration and customs law at an international airport and seaport, and later, worked in an intelligence unit for local and national counterterrorism and human and drug smuggling operations.

3. I am familiar with the facts and circumstances described herein. This affidavit is based upon my personal

involvement in this investigation, my training and experience, and information obtained from various law enforcement personnel and witnesses, including information that has been reported to me either directly or indirectly. This affidavit does not purport to set forth my complete knowledge or understanding of the facts related to this investigation. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only. All figures, times, and calculations set forth herein are approximate.

II. SUMMARY AND PURPOSE OF AFFIDAVIT: SEARCH WARRANT

4. This affidavit is made in support of a complaint against, and an arrest warrant and writ for, MCKENZIE MARIE EARLEY ("EARLEY") for violations of 18 U.S.C. § 1956 (conspiracy to launder money) and 21 U.S.C. §§ 846, 841(a)(1) (conspiracy to distribute controlled substances including fentanyl).

Summary

5. EARLEY was arrested in 2024 in possession of distribution quantities of controlled substances, which were also recovered in 2023 from her apartment. She admitted to me that she was a drug courier, but her phone shows that she was also a dealer.

6. EARLEY received \$42,000 from the proceeds of the fraudulent sale of house in 2022. She told me that she

understood the money came from "tax fraud" and that she kept some as her fee, and provided the bulk to others as she was told to.

III. PROBABLE CAUSE STATEMENT

A. EARLEY is serving a state prison sentence for an arrest during which her cell phone was seized

7. From reading their reports, I know that on or about May 13, 2024, Ventura County Sheriff Deputies observed EARLEY driving in her vehicle at a high rate of speed. Police were also investigating EARLEY for her role in a conspiracy to shoplift. Police conducted a traffic stop where after briefly stopping, EARLY slammed her door on the officer's hand and drove away almost dragging the officer with her. Police pursued her. During the pursuit, EARLEY rammed several occupied police cars who were trying to arrest her. The pursuit ended after about 59 minutes when CHP officers used a PIT Maneuver to stop her vehicle. EARLEY was arrested. In her vehicle police recovered 125.3 gross grams of fentanyl, 9.4 gg of meth, 30 gg of marijuana and 5.6gg of mushrooms, pay and owe sheets about drug dealing, and an Apple iPhone ("EARLEY'S TELEPHONE"). A few days after her arrest, EARLEY was found in her jail unconscious. In the medical unit, medical staff found about 15 gross grams of fentanyl in her body in baggies that had burst. Ventura Sheriff

Detectives told me EARLEY was also pregnant at the time.

8. From reviewing the Minute Order for Ventura County Superior Court, I know that on February 10, 2025, EARLEY plead guilty to charges stemming from this conduct and is currently serving her sentence for it in state prison.

B. EARLEY launders proceeds from the fraudulent sale of Robert Tascon's house

9. At the time of EARLEY's arrest described above, I was already investigating EARLEY for her role in a fraud and money laundering conspiracy. In or around October 2022, EARLEY received \$42,000 of funds stemming from an identity theft victim, Robert Tascon, whose house was fraudulently sold without his knowledge or consent. The victim later committed suicide. Three other members of the conspiracy have pleaded guilty so far.

10. In or around 2021, Caroline Herrling ("Herrling"), Jason Kroth ("Kroth") and other co-conspirators (The "Herrling Conspirators") defrauded a victim of identity theft, Robert Tascon. Sometime around 2018, Robert Tascon moved to Texas while he was in a legal battle to evict squatters who illegally resided in his property in Encino, California. According to the attorney for Tascon's estate, after Tascon won the eviction case, without Tascon's knowledge or approval, the Herrling Conspirators created a fake ID in Robert Tascon's name and forged power of attorney documents, as well as his signature,

and sold the Encino property without his permission. According to Tascon's common-law wife, due to his already on-going battle with depression and his lack of resources to fight the new legal battle to regain his Encino property, in September of 2022, Tascon committed suicide in Texas.

11. During the criminal investigation into the fraud against Robert Tascon, I and other law enforcement obtained warrants for the residences of some of the Herrling Conspirators. Found during the execution of these warrants were images of fake ID cards in the name of Robert Tascon bearing an impostor's face. In reviewing banking records and escrow documents, I observed a forged power of attorney document bearing Robert Tascon's name, which also had a fake notary stamp. This forged document was submitted to the escrow company to facilitate the fraudulent disbursement of funds stemming from the sale of Robert Tascon's property. I also observed that \$360,921.73 from the sale of the property were deposited into an E*Trade account in Robert Tascon's name ("Tascon Fraud E*trade Account"). However the account opening documents were forgeries, including the same counterfeit ID I observed from the search warrants.

12. Herrling, Kroth and Hassanshahi have all pleaded guilty to a conspiracy to commit wire fraud that encompassed the fraudulent sale of Robert Tascon's home.

C. FINANCIAL RECORDS SHOWED EARLEY RECEIVED FUNDS FROM THE ROBERT TASCON FRAUD.

13. In April 2024 and previous times, I reviewed the financial records for the fraudulent sale of Robert Tascon's house. In or about October 2022, members of the conspiracy used a fake ID in the name of Robert Tascon to open an E*trade account in the victim's name (Tascon Fraud E*trade Account). The Tascon property was sold for about \$1.5 million. Of those funds, a check for \$360,921.73 was issued by the escrow company payable to Robert Tascon. On or about October 8, 2022, the \$360,921.73 check was deposited into the Tascon Fraud E*trade Account. The funds were then distributed among various subjects. In reviewing the transactions, among other recipients, I observed that EARLEY received a total of \$42,000 of the fraud proceeds:

a. On October 21, 2022 the Tascon Fraud E*Trade Account sent \$10,500 to EARLEY at Bank of America account number ending in -8107;

b. On October 24, 2022 the Tascon Fraud E*Trade Account sent \$10,500 to EARLEY at Bank of America account number ending in -8107;

c. On October 25, 2022 the Tascon Fraud E*Trade Account sent \$10,500 to EARLEY at Bank of America account number ending in -8107; and

d. On October 26, 2022 the Tascon Fraud E*Trade

Account sent \$10,500 to EARLEY at Bank of America account number ending in -8107).

e. According to Bank of America records, a few days later, EARLEY also deposited \$20,000 in counterfeit U.S. Savings bonds into her personal Bank of America account ending in -8107. Indicative of fraud, these bonds were purportedly issued to McKenzie Marie Early in October, 1992, however, EARLEY was not born until 1995. EARLEY deposited four counterfeit US Series EE Savings Bonds on November 1, 2022, two with a face value of \$10,000, and two with a face value of a \$5,000. EARLEY attempted to withdraw the cash from the Savings Bond deposits, but her attempts were denied by Bank of America.

14. According to Bank of America records, funds from EARLEY's account number ending in -8107 were depleted via debit card transactions, ATM and teller cash withdrawals, ACH transfers to JP Morgan Chase account, and several Peer-to-peer transfers to High Culture Smoke Shop. As previously mentioned, EARLEY's employer at High Culture Smoke Shop was Bahram Hassanshahi, who pleaded guilty to the fraudulent sale of Robert Tascon's home. In my training and experience, it is common for criminals who receive an illegal windfall to spread the funds around among their co-conspirators so that it can be more rapidly withdrawn, or sent to other accounts that are further removed from the initial fraud to prevent banks from freezing

the illicit proceeds and to make them look more legitimate.

15. Bank of America closed EARLEY's in January 2023.

D. EARLEY ADMITTED TO MONEY LAUNDERING AND DRUG TRAFFICKING
DURING MY INTERVIEW

16. I interviewed EARLEY on June 7, 2024, at the Ventura jail, and covertly recorded it after she waived her Miranda rights in writing. During my interview with EARLEY, EARLEY admitted she delivered drugs for pay. EARLEY said she was supposed to transport "half a kilo of Fentanyl and some meth." EARLEY said she was paid \$500 per trip, and she did it about once a week.

17. EARLEY admitted she received about \$42,000 from wire transfers from the Tascon Fraud E*Trade Account. EARLEY said she thought the money came from tax fraud because "everyone was doing tax fraud at the time". EARLEY admitted she was allowed to keep \$10,000 and she sent the remaining \$32,000 to others as she was directed.

18. When asked about her arrest that resulted from her police chase and the drugs that was seized from her during that arrest, EARLEY told me that her "boyfriend, kind of" (hereinafter "Victim-1") kept breaking into her apartment. She was worried he was going to steal her "stuff," so she liked "to have everything [i.e. her drugs] on [her] all the time."

19. EARLEY stated she shot Victim-1 because he wouldn't leave and she felt threatened. When asked if she shot Victim-1

because Victim-1 was trying to rob her of drugs, she affirmed, "that, and [because she felt he would try] to hurt me."

E. REPORTS ABOUT EARLEY SHOOTING VICTIM-1, GUN AND DRUGS SEIZED BY POLICE

20. After EARLEY told me she shot Victim-1, I contacted the LAPD who provided me reports from the shooting of Victim-1 and the subsequent search and arrest of EARLEY. From these reports I learned the following:

21. On Wednesday, September 13, 2023, at approximately 10:30 AM, Detective Stroymer and Detective Baba conducted a follow up to Northridge Hospital and met with Victim-1 to discuss how he was shot. Victim-1 said he was involved in a dating relationship with EARLEY for approximately three weeks, but she was mainly his drug supplier or "plug".

22. On September 12, 2024, Victim-1 stayed at EARLEY's apartment located at 5680 Reseda Blvd, Tarzana, CA 91356, after a night out, and they consumed crystal meth together. On September 13, 2024, at approximately 06:15 AM, EARLEY accused Victim-1 of cheating on her, which Victim-1 denied. EARLEY went to her bedroom and armed herself with a 9mm firearm. EARLEY came back to the living room, where Victim-1 was standing and cocked the firearm. Victim-1 gathered his belonging and walked out of the apartment to de-escalate the situation, but EARLY followed him to the hallway and aimed the gun at him.

23. Victim-1 told EARLEY that she would not shoot him, and

she did striking him in the right forearm, and in the left shoulder area. Victim-1 fell to the ground and started yelling for help before pleading and begging for EARLEY to take him to the hospital. EARLEY eventually agreed and drove Victim-1 to the Tarzana Hospital in her rental vehicle. EARLEY dropped Victim-1 off near the Emergency Room before driving away to an unknown location. Victim-1 said EARLEY uses narcotics daily and has another firearm on her possession.

24. Detective Stroymer, Detective Baba, and Detective Hampton assisted in the execution of a state search warrant of EARLEY's residence. During the search, the officers collected two "baggies with a crystal-like substance resembling methamphetamine" totaling about 4082gg, five "baggies with a powder-like substance resembling cocaine or fentanyl" totaling about 3,264gg, one 9mm Sig Sauer P320, 11 rounds of 9mm live ammunition, one 9mm spent casing, one spent metal jacket, along with multiple DNA samples.

F. EARLEY'S TELEPHONE SHOWS DRUG TRAFFICKING BESIDES THE DELIVERIES SHE CONFESSED TO

25. I obtained a federal search warrant for EARLEY'S TELEPHONE. After reviewing the data collected from EARLEY'S TELEPHONE, I discovered that EARLEY not only delivered drugs as a courier, but also bought and sold drugs as a dealer. There were numerous conversations on EARLEY'S TELEPHONE discussing drug deals. In the conversations, EARLEY would directly mention

buying or selling drugs to her contacts along with listing prices and quantities. EARLEY also discussed many of her sales with customers and mentioned how certain people ripped her off or stole from her afterwards. In many conversations, EARLEY would reference certain drugs by an alias such as "confetti" (code for fentanyl), but the remainder of the conversation would render her earlier coded references obvious.

26. EARLEY also made many references to her "plugs" (slang for drug dealers) and included the word "plug" or the plug emoji in some of her contacts such as "Brandon Plug, Jorges Plug, Jose (plug emoji)." Many of EARLEY's contacts would reach out to her to purchase drugs, and EARLEY would usually reply with a price, a time, and/or a location for the transaction.

27. On October 26, 2023, EARLEY had a conversation with a phone contact ("Wifey Loizu"):

EARLEY: I don't have a ton of either so i did 10g of cris and I can do like 4/5 of confetti?"
Wifey Loizu: Cool... How much u want for fat... Dat?
EARLEY: I mean that's about 200\$ plus I'm delivering"
Wifey Loizu: yeah ok... No homie hook up I see
EARLEY: Nah I'm throwing some extra fet... And people usually pay \$100 for 3.5 g... So I am hooking you up... Lol... I just don't have the time right now and I actually do pay him for my shit when I'm selling it.

28. On February 26, 2024, EARLEY had a conversation with an unnamed phone contact EARLEY: "Did u buy the drugs?? Ohh wait no you didn't... So maybe get some money together and I'll sell u

a half for 350."

29. On February 29, 2024, EARLEY had a conversation with a phone contact ("Lacci"):

EARLEY: Sooo with what u owe me it's gonna be 160 total.. I'd rlyyy appreciate it if u pay it all rn and I'll hook u up... With the fet... I'm here btw
Lacci: Of course. Oh good ok. When you turn right into the parking lot if you just pass at Chase Bank, you'll see me parked on your right hand side
EARLEY: Oh I see you.

30. On March 2, 2024, EARLEY had a conversation with a phone contact ("Jenn"):

EARLEY: How'd u like the shit?... Also have like a shit ton of water I need to get rid of... Can u help me? Imma sell an ounce for like 100-120 depending if u have someone to sell it to so u can make some money
Jenn: Hi babe sorry I didn't text you back yesterday. It was hectic day lol" EARLEY: Not a problem !... I'm actually leaving Ventura rn if u need anything" Jenn: "Oh dang I do... good timing lol.

31. On March 8, 2024 EARLEY had another conversation with Jenn:

EARLEY: Hey boo, so wait how much money did you give me because you said you owe me about 35? Maybe I was confused but did you want a whole three pack on the front because he said only like a 40 of Fetty and I just wanted to hook it up for you... Cause you said you wanted the 20 bars for 80 and then a 40 of fat that's 120 and that's what you gave me... Oh wait, Lacey's man gave me \$10 extra from so they had give me 70 but don't worry about it... I just didn't realize you wanted a front... Or I mean you wanted the three pack

Jenn: Hey sorry, yes I wanted the 20 bars and a 40 of Fetty. I was so barred out and high and counted that money so many times. Apparently I was counting wrong and or I think I had a different price in my head fuck I took it from my daughters wallet with every intention to put it back today. So i might have paid you \$35 more on accident. Do you remember what i paid you? If I over paid that's ok. I don't want it back I just wanna make sure my daughters money is put back correctly lol... So no I did not want a whole 3 pk last night. Lmk how much I gave you in cash (: I wanna make sure I fully pay back my kid cuz I took everything she had lol #momoftheyear hahah

EARLEY: Lmao you gave me 110... If you overpaid, I would've definitely said something though don't worry.

32. On May 12, 2024, EARLEY had a conversation with a phone contact ("Jaden Alcocer"):

EARLEY: So I only have like 40grams but I can get more possibly tonight ?... So I have about ounce and a half basically... I could do 4.5 for 500\$... 3.5**... Or maybe 4 hold on.. cause rly I'm not making much off of it

J Alcocer: Ok. Which is it, sweet cheeks? I am getting confused. lol

EARLEY: Does he want to wait until I can have all of it? Or does he want to do an ounce and a half tonight for 180?... Basically 120 an ounce... So yeah final answer for 500 id do a total of 4 ounces cause I have to pick it up and taking the risk of driving it which is fine but ya know

J Alcocer: Ok, I could take the 1 and half tonight. Where do you want to meet babes?" EARLEY: "we can meet at like cvs or that Vons parking lot by Jorge's... Okay so total is 180 but I need gas moneyyyy plz... like 10\$ especially because my check engine light is on and it has to do with my radiator" Jaden Alcocer: "I sent you \$190 in two transactions, dahhhling.

33. On October 2, 2024, EARLEY had a conversation with a

phone contact ("Kate Hotel"):

EARLEY: Hey I need the money from the blues u got... And I'll give u the Getty too... Fetty too... Since u lied the blues gonna be 60 \$

Kate Hotel: Girl! I've been worried. If it didn't work, it was an accident I promise I really didn't want you thinking I was doing anything shady... Can I Venmo you?

EARLEY: so 150 and 60 is 210... Yeah.

IV. CONCLUSION

34. Based on the foregoing, I contend there is probable cause that EARLEY conspired to launder money and to distribute controlled substances.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 18TH day of April, 2025.



HON. A. JOEL RICHLIN
UNITED STATES MAGISTRATE JUDGE